

Appln No. 09/692,829
Amdt date July 6, 2006
Reply to Office action of May 18, 2006

REMARKS/ARGUMENTS

Claims 1-73 and 75-98 are pending, of which claims 1, 19, 36, 50, 59, 64, 70, 75, 91, 93, 95 and 97 are independent. Claims 1, 19, 36, 50, 59-70, 75, 91, 93, 95 and 97 have been amended. No claims have been added or cancelled. The Applicant notes that claims 65-69 have been amended solely to correct a typographical error reciting dependence from claim 63 instead of claim 64. Accordingly, claims 65-69 have not been amended for patentability.

The Applicants thank the Examiner for his time during the telephonic interview on Monday, June 26, 2006 during which the Applicants' case was discussed. The Examiner suggested some language that may render independent claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97 allowable.

The Examiner has not acknowledged the Information Disclosure Statement (IDS) that was filed March 12, 2002. Applicants respectfully request acknowledgment of the above-mentioned IDS by initialing and returning the attached copy of the IDS, which the Applicants have provided for the Examiner's convenience. The Applicants also attach hereto a copy of the acknowledgement receipt acknowledging that the United States Patent and Trademark Office received the IDS on March 21, 2002.

Page three of the Office action states that "using passwords to secure ACH networks," "DTR and velocity controls," "prioritized purchase transactions" and "Pre-paid plans" are considered admitted prior art. The Applicants respectfully disagree that the preceding are admitted prior art. The Office action points to page 72, lines 9-11 as support for the

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assertion that the elements are well known. However, the Applicants respectfully note that page 72, lines 9-11 of the specification makes no such admission that DTR, velocity controls nor prioritized purchase transactions are old or well known. Lines 9-11 of page 72 merely state:

There can be Prioritize Postage Purchase Authorizations over monthly billing charges and postage purchase captures in the credit card pipeline if the credit card software allows this. This allows better real-time responsiveness for online postage purchases.

The Applicants respectfully note that while using passwords may be well known, using passwords to secure ACH networks is not well known. Additionally, the elements of claim 89: "ACH purchase velocity controls, online postage purchase audits, prioritized purchase authorizations, and automated DTR/DBAR faxing" are not well known. Additionally, with regard to claim 90, "prepaid plan expiration notification" is not well known. Finally, DTR and velocity controls are not well known.

Additionally, the Applicants request evidence supporting the assertions that "using passwords to secure ACH networks," "DTR and velocity controls," "prioritized purchase transactions" and "Pre-paid plans" are well known.

Claims 1-73 and 75-98 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite regarding the claimed phrase "a second plurality of security information that was provided upon login to the client subsystem" (emphasis in original).

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In view of amendments to claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97, the Applicants believe that the 35 U.S.C. §112, second paragraph rejections to claims 1-73 and 75-98 have been overcome and respectfully request that these rejections be withdrawn.

Claims 1-7 and 9-18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lewis et al. (U.S. 6,233,565) ("Lewis") in view of Hayes Jr. (U.S. 6,105,063) ("Hayes") and further in view of Acosta et al. (U.S. 6,166,729) ("Acosta"). Claims 8, 40 and 52 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lewis, Hayes and Acosta as applied to claims 36 and 50 and in further view of Kennedy (U.S. 6,134,582) ("Kennedy"). Claims 19-25, 27 and 30-35 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lewis in view of Hayes and (based on a citation provided on page 13 of the Office action) Gupta et al. (U.S. 6,226,752) ("Gupta"). Claim 26 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Lewis, Hayes and Acosta as applied to claims 36 and 50 and in further view of Kennedy. Claims 28 and 29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lewis, Hayes, Gupta as applied to claim 19 and in further view of Tanaka (U.S. 6,385,654) ("Tanaka"). Claims 36-39, 41, 44-51, 53, 55-70, 73 and 91-96 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lewis in view of Hayes and Acosta. Claims 42, 43 and 54 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lewis in view of Hayes and Acosta as applied to claims 36 and 50 and in further view of Tanaka. Claims 71 and 72 are rejected under 35 U.S.C. § 103(a) as being

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unpatentable over Lewis, Hayes and Acosta as applied to claim 70 and in further view of Kara (U.S. 6,233,568) ("Kara"). Claims 75-90, 97 and 98 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lewis, Hayes, Acosta and Remington et al. (U.S. 6,070,150) ("Remington"). The Applicants submit that all of the pending claims in this application are patentably distinguishable over the cited references, and reconsideration and allowance of the pending claims are respectfully requested.

Amended independent claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97 recite, in part: "a plurality of smartcards for providing the support personnel access to a user account withdrawal and meter refund application." (Emphasis Added).

The Applicants can find no teaching or suggestion, alone or in combination, of the above limitations in the cited references.

The Applicants agree with the Examiner that neither Lewis nor Hayes teach or suggest "using smart cards to logon to a computer." Additionally, the Applicants can find no teaching or suggestion in Lewis or Hayes of smartcards in general nor of the Applicants' amended limitation of independent claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97: "a plurality of smartcards for providing the support personnel access to a user account withdrawal and meter refund application." (Emphasis Added). Further, Acosta does not cure this deficiency.

Acosta, as cited by the Examiner, teaches a remote viewing system with client computers wherein for the client login process (col. 29, line 10), "client computers 22 for any services for which a greater degree of security is required can

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also be required to use Smartcards or other authentication tokens to augment the login process" (col. 29, lines 16-19). Accordingly, while Acosta may teach using Smartcards to augment a login process, it does not teach the Applicants' amended claimed limitation of: "a plurality of smartcards for providing the support personnel access to a user account withdrawal and meter refund application." (Emphasis Added)

Accordingly, independent claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97 are patentably distinguishable over Lewis in view of Hayes and further in view of Acosta. The Applicants therefore request that the Examiner withdraw the rejections of claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97 and that these claims be allowed.

Claims 2-18, 37-49, 51-58, 65-69, 71-73, 76-90, 92, 94, 96 and 98 depend from independent claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97, respectively. As such, these dependent claims necessarily incorporate the limitations of their respective independent claims and are therefore patentable at least for the reasons presented above for claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97, as well as for their additional limitations. The Applicants therefore request that the Examiner withdraw the rejections of claims 2-18, 37-49, 51-58, 65-69, 71-73, 76-90, 92, 94, 96 and 98 and that these claims be allowed.

Independent claim 19 recites, in part: "one or more devices configured to perform biometric verification, wherein upon performing biometric verification, access to one or more predetermined system applications is provided." (Emphasis Added)

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The Applicants can find no teaching or suggestion, alone or in combination, of the above limitations in the cited references.

The Applicants agree with the Examiner that "neither Lewis et al. nor Hayes Jr. specifically recite authentication using biometric data." Additionally, neither Lewis nor Hayes teach the claim 19 limitation of: "one or more devices configured to perform biometric verification, wherein upon performing biometric verification, access to one or more predetermined system applications is provided." (Emphasis Added) Further, Gupta does not cure this deficiency.

While the cited portions of Gupta may teach placing a photograph or signature on a card to enable the cardholder to authenticate himself such as with a standard identification card (e.g., driver's license) (see col. 5, lines 24-29), and while the cited portions of Gupta may teach a device capable of reading the card (col. 5, lines 29-30), Gupta teaches reading the mere card itself but not performing "biometric verification." One skilled in the art would determine that the "biometric verification" claimed in amended claim 19 is different from the aforementioned teachings of Gupta.

For example, as noted in Wikipedia.com ([Http://en.wikipedia.org/wiki/Biometrics](http://en.wikipedia.org/wiki/Biometrics)):

In information technology, *biometric authentication [or biometric verification]* refers to technologies that measure and analyze human physical ... characteristics for authentication purposes. Examples of physical characteristics include fingerprints, eye retinas and irises, facial patterns and hand measurements (Emphasis Added).

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The Applicants therefore can find no teaching or suggestion of "one or more devices configured to perform biometric verification, wherein upon performing biometric verification, access to one or more predetermined system applications is provided." (Emphasis Added). The Applicants therefore request that the Examiner withdraw the rejection of claim 19 and that this claim be allowed.

Claims 20-35 depend from independent claim 19. As such, these dependent claims necessarily incorporate the limitations of claim 19 and are therefore patentable at least for the reasons presented above for claim 19, as well as for their additional limitations. The Applicants therefore request that the Examiner withdraw the rejections of claims 20-35 and that these claims be allowed.

Amended independent claim 59 recites, in part: "providing support personnel, having a predetermined authorization level, access over a network to the user account information" and "providing a withdrawal processing support code by the support personnel to allow the support personnel to provide meter refund and withdrawal processing support to a user and to obtain access to the client subsystem after the user has tried unsuccessfully to process a meter refund or withdrawal. . . ." (Emphasis Added).

The Applicants can find no teaching or suggestion, alone or in combination, of the above limitations in the cited references.

While the cited portions of Lewis may teach that when a user requests a refund for the complete amount in his account

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that the user account is automatically canceled (col. 17, lines 40-67), they do not teach the claimed limitation of "providing support personnel, having a predetermined authorization level, access over a network to the user account information" and "providing a withdrawal processing support code by the support personnel to allow the support personnel to provide meter refund and withdrawal processing support to a user and to obtain access to the client subsystem after a user has tried unsuccessfully to process a meter refund or withdrawal. . . ." (Emphasis Added) Neither the cited portions of Hayes nor Acosta cure this deficiency.

Even if, as asserted in the Office action, Hayes teaches graphical interfaces for accessing one or more databases in a server system and even if, as asserted in the Office action, Acosta teaches using security information stored on a smartcard during a user login process, neither Hayes nor Acosta teach the above claim limitation of amended claim 59.

Accordingly, independent claim 59 is patentably distinguishable over Lewis in view of Hayes and Acosta. The Applicants therefore request that the Examiner withdraw the rejection of claim 59 and that this claim be allowed.

Claims 60-63 depend from independent claim 59. As such, these dependent claims necessarily incorporate the limitations of claim 59 and are therefore patentable at least for the reasons presented above for claim 59 as well as for their additional limitations. The Applicants therefore request that the Examiner withdraw the rejections of claims 60-63 and that these claims be allowed.

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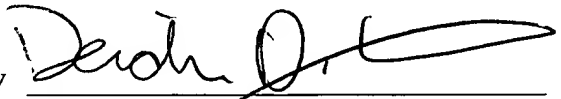
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In view of the above amendments and remarks it is submitted that the claims are patentably distinct over the cited references and that all the rejections to the claims have been overcome. Reconsideration and reexamination of the above Application is requested.

If there are any remaining issues that can be addressed over the telephone, the Examiner is cordially invited to call the Applicants' Attorney at the number listed below.

Respectfully submitted,

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